

In re:)	
Juana Ortiz,)	Case No.: 5:22-bk-00155-MJC
Debtor.)	Chapter 13
)	
Kingdom RCG Evergreen Fund Series I LLC,)	Trustee Jack N. Zaharopoulos
)	
Movant,)	
)	
v.)	Jude Mark J. Conway
)	
Juana Ortiz,)	
)	
Respondent.)	

COMES NOW, SECURED CREDITOR, Kingdom RCG Evergreen Fund Series I LLC (herein after referred to as “Secured Creditor”), by and through its undersigned counsel, and hereby files this Notice of Withdraw of its Notice of Default[Doc. No. 85] as the full cure payment has been received.

I HEREBY CERTIFY that I am admitted to the Bar of the United States Bankruptcy Court for the Middle District of Pennsylvania, and I am in compliance with the additional qualifications to practice in this Court set forth in the Local Rules.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th Day of June 2025, I served a copy of the foregoing by regular U.S. Mail or the Court's CM/ECF system to the following parties listed on the below service list:

SERVICE LIST

Debtor

Juana Ortiz
620 N. Putnam St.
West Hazleton, PA 18202

Tullio DeLuca
381 N. 9th Avenue
Scranton, PA 18504

Debtor(s) Attorney

Trustee

Jack N Zaharopoulos
Standing Chapter 13
(Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Asst. U.S. Trustee

United States Trustee
US Courthouse
1501 N. 6th St
Harrisburg, PA 17102

DWALDMANLAW, P.C.
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Mechanicsburg, PA 17050
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Attorneys for Secured Creditor

By: /s/ Jennie C. Shnayder
Jennie C. Shnayder, Esq.
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